



100 Grand Street New Britain CT 06050

December 12, 2020

To:  
U.S. Nuclear Regulatory Commission  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

From:  
The Hospital of Central Connecticut  
Department of Radiation Safety  
RAM License No.06-02388-01

Re: Radioactive Materials License (RAML) Amendment Request for In-Direct Transfer of Control  
This letter and attachments can be made publicly available in order to post it to the NRC website for public comment.

We are writing regarding The Hospital of Central Connecticut (HOCC) compliance with federal law related to notification of transfer or change of control over our U.S. Nuclear Regulatory Commission ("U.S.NRC") license. HOCC holds a U.S. Nuclear Regulatory Commission ("NRC") Radioactive Materials License, number 06-02388-01.

10 CFR 30.34(b)(1) requires that "no license issued or granted pursuant to the regulations in this part and parts 31 through 36, and 39 nor any right under a license shall be transferred, assigned or in any manner disposed of either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing."

Hartford Healthcare Corporation ("HHC") was formed on or about August 21, 1985. The Hospital of Central Connecticut joined Hartford Healthcare Corporation as a subsidiary in 2006. Hartford HealthCare was formed in order to establish an integrated health system. Since its establishment, HHC has grown by affiliating with many medical practices and medical institutions. Each affiliate has its own president and management group that work in conjunction with the leadership of Hartford HealthCare towards the mutual goal of quality health care.

In regards to the U.S.NRC and the materials licenses, each location of use of radioactive material has continued to operate separately and independently. Management responsibilities and control of the radiation programs within each site has not changed. Each licensed facility is monitored by its own Radiation Safety Committee and thereby each licensed facility remains responsible for its own radioactive materials and programs. At the time of transfer, there were no anticipated changes.

There were no changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on the Hospital of Central Connecticut Center's Board of Directors, etc. that occurred as a result of the 2006 In-direct transfer of control.

Please see the attached Organization Chart for the Hospital of Central Connecticut as a Hartford HealthCare hospital partner.

At the time of the partnership of the Hospital of Central Connecticut with Hartford HealthCare, it was believed that the Hartford HealthCare organizational structure did not warrant notice to the U.S. NRC under 10 CFR 20.34(b)(1). There was no change in location, facilities, equipment, providers or the surveillance program as a result of the change in ownership. Additionally, the transfer did not result in any change to licensed name, licensed material, persons using the licensed material, location of the material or persons responsible for the licensee's radiation safety program. Accordingly, there may have been a belief that notice was not required.

Changes did not occur regarding personnel, personnel duties, or the training program related to the licensed program as a result of the 2006 In-direct transfer of control.

Changes did not occur regarding the radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program as a result of the 2006 In-direct transfer of control.

Facility changes in equipment and radiation safety program content did not occur as a result of the In-direct transfer. Decontamination was not required prior to the in-direct transfer. Equipment calibrations, leak tests, area surveys, wipe tests, training, quality control, and all related program records were up to date at the time of the In-direct transfer of control.

No areas of contamination were detected at the time of the In-direct transfer of control. The Hospital of Central Connecticut retained control over all Radioactive Materials Use areas following the In-direct transfer of control.

Records concerning the safe and effective decommissioning of the facility will be maintained or transferred to the NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

The Hospital of Central Connecticut and Hartford HealthCare acknowledge the NRC required indirect control of licensed material and the conditions of transfer. Hartford HealthCare was made aware of any open inspection items and the responsibility for enforcement actions.


If Hartford HealthCare would choose to exercise any indirect control over the Hospital of Central Connecticut's radioactive material license, Hartford HealthCare will abide by all constraints, conditions, requirements, representations, and commitments of the Hospital of Central Connecticut or that the Hartford HealthCare will submit a complete description of the proposed licensed program.

Please accept this letter as our response regarding compliance with 10 CFR 30.34(b)(1). Please accept this document as acknowledgement and request for permission for the in-direct control relationship between the Hospital of Central Connecticut and Hartford HealthCare. If you require anything further, or if have any questions or concerns, please do not hesitate to contact me.

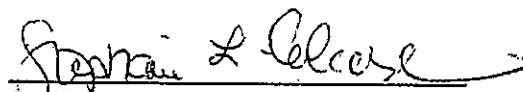
Respectfully,



Bette Blankenship MS, DABR, FAAPM  
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Stephanie Calcasola  
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June 25, 2019

U.S. Nuclear Regulatory Commission  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

Re: Radioactive Materials License Transfer

To Whom it May Concern,

For all Hartford HealthCare facilities that are licensed for use of radioactive materials, including SVMC Holdings, Inc. (the Hartford HealthCare entity that will acquire substantially all of the assets of St. Vincent's Medical Center), the control of such radioactive materials remains and will remain at the local hospital level. Further, the clinical care provided at these Hartford HealthCare facilities is governed by the hospital's Board of Directors and not by the Hartford HealthCare Corporation Board of Directors.

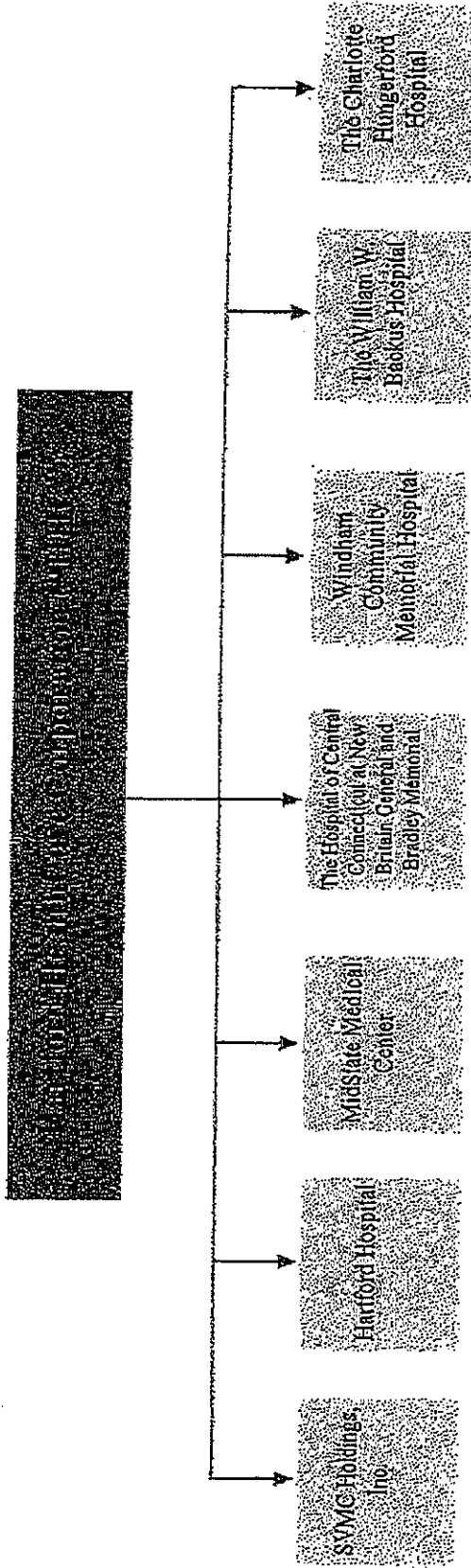
An abridged corporate organization chart is attached to this letter to display the affiliation between Hartford HealthCare Corporation, as the parent company, and its wholly owned affiliate hospitals.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Tuttle".

Kevin Tuttle  
Associate General Counsel  
Hartford HealthCare Corporation

CORPORATE ORGANIZATION CHART  
Hartford HealthCare Corporation



HHC Central Region  
The Hospital of Central CT /  
MidState Medical Center

President  
Gary Havican

